VII. CONCLUSION

The RTC and GVNW urge the Commission not to mandate the use of any proxy for universal service support before allowing further study on new issues raised during the proxy workshops. Many issues remain unresolved. The Commission should consider panelists' comments regarding the need to account for market share and the need for consistent assumptions in the models. Further, until input data for independent companies is available, the Hatfield model should not be considered in this proceeding.

Respectfully submitted,

THE RURAL TELEPHONE COALITION

NRTA

NTCA

OPASTCO

Margot Smiley Humphrey

David Cosson

Lisa M Zaina

Pamela Sowar Fusting

Koteen & Naftalin, LLP

1150 Connecticut Ave., NW

Suite 1000

Washington, D.C. 20036

(202) 467-5700

2626 Pennsylvania Ave., NW

Washington, D.C. 20037

21 Dupont Circle, NW

Suite 700

Washington, D.C. 20036

(202) 298-2300

(202) 659-5990

Robert Schoonmaker

GVNW-Management, Inc. 2270 La Montana Way

Colorado Springs, Colorado 80918

(719) 594-5800

January 24, 1997

CERTIFICATE OF SERVICE

I, Gail C. Malloy, certify that a copy of the foregoing Comments of the Rural Telephone Coalition and GVNW, Inc. Management in CC Docket No. 96-45 was served on this 24th day of January 1997, by first-class, U.S. Mail, postage prepaid, to the following persons on the attached list:

Gail C. Maller,
Gail C. Malloy

The Honorable Reed E. Hundt Chairman Federal Communications Commission 1919 M Street, N.W., Room 814-0101 Washington, D.C. 20554

The Honorable Rachelle B. Chong Commissioner Federal Communications Commission 1919 M Street, N.W., Room 844-0105 Washington, D.C. 20554

The Honorable Laska Schoenfelder Commissioner South Dakota Public Utilities Commission State Capitol 500 East Capitol Street Pierre, South Dakota 57501-5070

Paul Pederson State Staff Chair Missouri Public Service Commission P.O. Box 360 Truman State Office Building Jefferson City, Missouri 65102

Martha S. Hogerty Public Counsel for the State of Missouri P.O. Box 7800 Harry S. Truman Building, Room 250 Jefferson City, MO 65102

Lorraine Kenyon Alaska Public Utilities Commission 1016 West Sixth Avenue, Suite 400 Anchorage, AK 99501

Mark Long
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399-0850

The Honorable Susan Ness Commissioner Federal Communications Commission 1919 M Street, N.W., Room 832-0104 Washington, D.C. 20554

The Honorable Sharon L. Nelson Chairman Washington Utilities & Transportation Commission Chandler Plaza Building 1300 South Evergreen Park Drive, S.W. Olympia, WA 98504-7250

The Honorable Julia Johnson Commissioner Florida Public Service commission Capital Circle Office Center 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

The Honorable Kenneth McClure Vice Chairman Missouri Public Service commission 301 W. High Street, Suite 530 Jefferson City, MO 65102

Charles Bolle
South Dakota Public Utilites
Commission
State Capitol, 500 E. Capital Avenue
Pierre, South Dakota 57501-5070

Debra M. Kriete Pennsylvania Public Utilities Commission P.O. Box 3265 Harrisburg, PA 17105-3265

Sandra Makeeff Iowa Utilities Board Lucas State Office Building Des Moines, IA 50319 Philip F. McClelland Pennsylvania Office of Consumer Advocate 1425 Strawberry Square Harrisburg, PA 17120

Terry Monroe New York Public Service Commission Three Empire Plaza Albany, NY 12223

James Bradford Ramsay
National Association of Regulatory
Utility Commissioners
1201 Constitution Avenue, N.W.
Washington, D.C. 20423

International Transcription Service 2100 M Street, N.W. Suite 140 Washington, D.C. 20037

James Casserly
Federal Communicatin Commission
Office of Commissioner Ness
1919 M Street, Room 832
Washington, D.C. 20554

Emily Hoffnar Federal Communications Commission 2100 M Street, N.W., Room 8918 Washington, D.C. 20554

Ms. Sheryl Todd Universal Service Branch Accounting and Audits Division Common Carrier Bureau 2100 M Street, N.W., Room 8611 Washington, D.C. 20554 Michael A. McRae D.C. Office of the People's Counsel 1133 15th Street, N.W., Suite 500 Washington, D.C. 20005

Lee Palagyi
Washington Utilities and Transporation
Commission
P.O. Box 47250
Olympia, WA 98504-7250

Brian Roberts California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102-3298

Deonne Bruning Nebraska Public Service Commission 300 The Atrium 1200 N Street, P.O. Box 94927 Lincoln, NE 68509-4927

Daniel Gonzalez
Federal Communications Commission
Office of Commissioner Chong
1919 M Street, N.W., Room 844
Washington, D.C. 20554

Barry Payne Indiana Office of the Consumer Counsel 100 North Senate Avenue, Room N501 Indianapolis, IN 46204-2208

Rowland Curry Texas Public Utility Commission 1701 North Congress Avenue P.O. Box 13326 Austin, TX 78701 Bruce B. Ellsworth New Hampshire Public Utilities Commission 8 Old Suncook road, Building No. 1 Concord, NH 03301-5185 Tom Boasberg Federal Communications Commission Office of the Chairman 1919 M Street, N.W., Room 814 Washington, D.C. 20554